

James H. Goetz
J. Devlan Geddes
GOETZ, GALLIK & BALDWIN, P.C.
35 North Grand
P.O. Box 6580
Bozeman, MT 59771-6580
Ph: (406) 587-0618
Fax: (406) 587-5144
E-mail: jim@goetzlawfirm.com
devlan@goetzlawfirm.com

and

Bonnie Steingart
John W. Brewer
Fried, Frank, Harris, Shriver & Jacobson, LLP
One New York Plaza
New York, NY 10004
Ph: (212) 859-8000
Fax: (212) 859-4000
E-mail: BrewJo@ffhsj.com

ATTORNEYS FOR PLAINTIFF, Magten
Asset Management Corporation

RECEIVED

JUL 21 2004

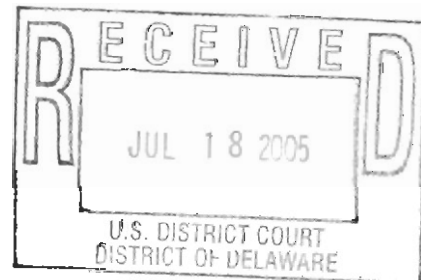
CLERK, U.S. DISTRICT COURT
DISTRICT OF MONTANA

FILED
BUTTE, MT

'04 JUL 20 AM 9 42

PATRICK E. DUFFY, CLERK

DEPUTY CLERK



05 - 499

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MONTANA
BUTTE DIVISION

MAGTEN ASSET MANAGEMENT
CORPORATION,

Plaintiff,

vs.

MIKE J. HANSON, JACK D. HAFHEY, ERNIE J.
KINDT and ELLEN M. SENECHAL,

Defendants.

Cause No. CV-04-26-BU-RFC

MOTION FOR ADMISSION *PRO*
HAC VICE

COMES NOW, J. Devlan Geddes, counsel for Plaintiff and Movant herein, and moves for entry of an order, pursuant to L. R. 83.3(e), admitting John W. Brewer and Bonnie Steingart *pro hac vice* for the purposes of representing Plaintiff in the above-captioned case. In support of this motion, the undersigned submits the following information:

1. Movant is a member in good standing of the Bar of this Court;

2. Movant maintains an office as an attorney with the law firm of Goetz, Gallik & Baldwin, P.C., 35 North Grand Avenue, P. O. 6580, Bozeman, MT 59715;
2. Movant's telephone number is (406) 587-0618;
3. Movant is attorney of record in this case and will be actively engaged in this matter in accordance with Federal Rules of Civil Procedure and the Local Rules of this Court;
4. The *Declarations of John W. Brewer and Bonnie Steingart in Support of Motion for Admission Pro Hac Vice* are attached.

WHEREFORE, Movant respectfully requests entry of an *Order* permitting John W. Brewer and Bonnie Steingart to appear *pro hac vice* in this case.

RESPECTFULLY SUBMITTED this 19th day of July, 2004.

GOETZ, GALLIK & BALDWIN, P.C.

By:


J. Devlan Geddes

ATTORNEY FOR PLAINTIFF, Magten Asset
Management Corporation

CERTIFICATE OF SERVICE

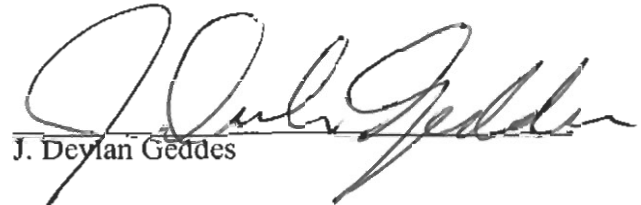
The undersigned hereby certifies that the foregoing document was served upon the following counsel of record, by the means designated below, this 19th day of July, 2004.

- ☒ U.S. Mail
☐ Federal Express
☐ Hand-Delivery
☐ Via Fax: (212) 859-4000

Bonnie Steingart
John W. Brewer
Fried, Frank, Harris, Shriver & Jacobson, LLP
One New York Plaza
New York, NY 10004
ATTORNEYS FOR PLAINTIFFS

- ☒ U.S. Mail
☐ Federal Express
☐ Hand-Delivery
☐ Via Fax: (406) 443-6883

Kimberly A. Beatty
Browning, Kaleczyc, Berry & Hoven, P.C.
P. O. Box 1697
Helena, MT 59624
ATTORNEYS FOR DEFENDANTS


J. Devlan Geddes

James H. Goetz
J. Devlan Geddes
Goetz, Gallik & Baldwin, P.C.
35 North Grand Avenue
P.O. Box 6580
Bozeman, Montana 59771
(406) 587-0618

Attorneys for Plaintiff
MAGTEN ASSET MANAGEMENT CORPORATION

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MONTANA
BUTTE DIVISION**

-----X	:	
MAGTEN ASSET MANAGEMENT CORPORATION,	:	
	:	
Plaintiff,	:	Cause No. CV-04-26-BU-RFC
	:	
- against -	:	DECLARATION OF
	:	JOHN W. BREWER
	:	IN SUPPORT OF MOTION
MIKE J. HANSON and ERNIE J. KINDT,	:	FOR ADMISSION
	:	PRO HAC VICE
	:	
Defendants.	:	
-----X	:	

DECLARATION OF JOHN W. BREWER

I, JOHN W. BREWER, declare under penalty of perjury pursuant to 28 U.S.C. § 1746
that:

1. This declaration is made in support of the Motion for Admission *Pro Hac Vice*
made on my behalf by J. Devlan Geddes of the law firm of Goetz, Gallik & Baldwin, P.C., 35
North Grand Avenue, P.O. Box 6580, Bozeman, Montana 59771-6580, telephone (406) 587-
0618.

2. I am a resident of the State of New York and Special Counsel to the law firm of Fried, Frank, Harris, Shriver & Jacobson LLP, One New York Plaza, New York, NY 10004, telephone (212) 859-8000.

3. I am a member in good standing of the Bar of the following Courts:

- a. State of New York—admitted May 2, 1994
- b. U.S. District Court for the Southern District of New York—admitted June 26, 1996;
- c. U.S. District Court for the Eastern District of New York—admitted July 17, 1996;
- d. U.S. District Court for the Western District of New York—admitted May 4, 1998;
- e. U.S. Bankruptcy Court for the Western District of New York—admitted June 12, 1998;
- f. U.S. Court of Appeals for the 3rd Circuit—admitted July 2, 1993.
- g. U.S. Court of Appeals for the 11th Circuit—admitted June 5, 2003.

4. I am not currently suspended or disbarred in any court.

5. I have never been held in contempt, otherwise disciplined by any court for disobedience to its rules or orders, or sanctioned under Federal Rules of Civil Procedure 11 or 37(b), (c), (d) or (g) or their state equivalent.

6. I have not previously made a *pro hac vice* application to this Court.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 14, 2004 in New York, New York.


John W. Brewer

James H. Goetz
J. Devlan Geddes
Goetz, Gallik & Baldwin, P.C.
35 North Grand Avenue
P.O. Box 6580
Bozeman, Montana 59771
(406) 587-0618

Attorneys for Plaintiff
MAGTEN ASSET MANAGEMENT CORPORATION

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MONTANA
BUTTE DIVISION**

-----X
MAGTEN ASSET MANAGEMENT CORPORATION, :

Plaintiff, :

- against - :

MIKE J. HANSON, and ERNIE J. KINDT, :

Defendants. :
-----X

Cause No. CV-04-26-BU-RFC

**DECLARATION OF
BONNIE STEINGART
IN SUPPORT OF MOTION
FOR ADMISSION
PRO HAC VICE**

DECLARATION OF BONNIE STEINGART

I, BONNIE STEINGART, declare under penalty of perjury pursuant to 28 U.S.C. § 1746
that:

1. This declaration is made in support of the Motion for Admission *Pro Hac Vice*
made on my behalf by J. Devlan Geddes of the law firm of Goetz, Gallik & Baldwin, P.C., 35
North Grand Avenue, P.O. Box 6580, Bozeman, Montana 59771-6580, telephone (406) 587-
0618.

2. I am a resident of the State of New York and a partner in the law firm of Fried, Frank, Harris, Shriver & Jacobson LLP, One New York Plaza, New York, NY 10004, telephone (212) 859-8000.

3. I am a member in good standing of the Bar of the following Courts:

- a. State of New York—admitted April 7, 1980
- b. U.S. District Court for the Southern District of New York—admitted June 6, 1980;
- c. U.S. District Court for the Eastern District of New York—admitted June 5, 1980;
- d. U.S. District Court for the Eastern District of Michigan—admitted March 3, 1988;
- e. U.S. Court of Appeals for the 4th Circuit—admitted March 17, 1988;
- f. U.S. Court of Appeals for the 2nd Circuit—admitted May 12, 1988;
- g. U.S. Supreme Court—admitted January 9, 1985.

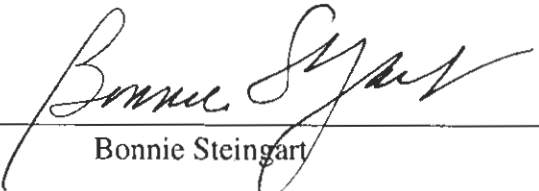
4. I am not currently suspended or disbarred in any court.

5. I have never been held in contempt, otherwise disciplined by any court for disobedience to its rules or orders, or sanctioned under Federal Rules of Civil Procedure 11 or 37(b), (c), (d) or (g) or their state equivalent.

6. I have not previously made a *pro hac vice* application to this Court.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 14, 2004 in New York, New York.


Bonnie Steingart